

### REMARKS

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Office Action dated June 29, 2007. In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

#### Status of the Claims

As outlined above, claims 1-17 stand for consideration in this application, wherein claims 1, 12, and 16 are being amended.

All amendments to the application are fully supported therein, including page 19, line 17 – page 20, line 4 of the specification. Applicants hereby submit that no new matter is being introduced into the application through the submission of this response.

#### Formal Rejections

Claims 1-17 were rejected under 35 U.S.C. §112, first paragraph, for failing to comply with the enablement requirement.

With respect to claim 11, Applicants respectfully traverse this rejection. For example, Fig. 12 illustrates a lod score as “other external information about the term” recited in claim 1. As shown in Fig. 12, the relationship between the terms is displayed on the screen at the same time with a lod score, which is other external information about the term. Therefore, Applicants respectfully submit that claim 11 is supported by at least Fig. 12 and page 22, line 27 – page 23, line 22 of the specification. Claims 1 and 12 are being amended so as to meet the requirements under 35 U.S.C. §112, first paragraph. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 12 was rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claim 12 is being amended so as to meet the requirements under 35 U.S.C. §112, second paragraph. Accordingly, withdrawal of this rejection is respectfully requested.

### Prior Art Rejections

Claims 1-5, 7-9, 11, and 16-17 were rejected under 35 U.S.C. §102(b) as being anticipated by Miller et al. (U.S. Publication No. 2002/0091678 ). Applicants respectfully traverse this rejection for the reasons set forth below.

According to the M.P.E.P. §2131, a claim is anticipated under 35 U.S.C. §102 (a), (b), and (e) only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

Claim 1 as amended recites that a network drawing system comprises: a first input unit designating a first query having terms belonging to a first category; a second input unit designating a second query having terms belonging to a second category; a data storage device storing terms belonging to a third category in a form of a table, the terms of the third category comprising terms from the first category and the second category; a calculation device which calculates a relationship between the input first query and second query through a plurality of terms using the table stored in said data storage device, the table including a degree of association of a relationship between terms belonging to the third category; and a display device displaying on a screen a network of terms connecting the first query and the second query through a chain of the plurality of terms based on a result of calculation made by said calculation device.

In the system as recited in claim 1, a data storage device stores degrees of association of relationships between terms belonging to a third category as a table. A degree of association of relationship between terms indicates how strongly the terms are associated with each other. The terms of the third category comprise terms from the first category and the second category which belong to designated first and second queries, respectively. A calculation device calculates a degree of association of a relationship between the first term and second term through a plurality of terms belonging to the third category using the table. Here, the plurality of terms are corresponded in a chain of association, for example, the first query<-->terms 1<-->term 2<-->the second query, and the strength of the association of the first query and the second query is calculated based on the corresponding relationships as follows the first query<-->terms 1, terms 1<-->term 2, terms 2<-->the second query. The calculation method is described on page 5 of the present specification. A display device displays a network of terms connecting the first query and second query through the plurality of terms based on a result of the association made by the calculation device. Thereby, a term relationship existing between the first query and the second query can be found.

Consequently, it is easy to find an association degree between terms, which are apparently not considered to be associated with each other.

In contrast, Miller shows displaying co-occurring information for query objects 31-36 (points 38) and connecting co-occurrence information between the queries through an arc 57 for display (Fig. 4). Thereby, association between a plurality of queries and one certain occurrence information (term) may be found (Figs. 3 and 4). However, Miller does not show or suggest storing a degree of association of a relationship between terms as a table in a data storage device nor constructing a network of a plurality of terms connecting between queries based on the degree of association of the relationship between terms, and fails to show the idea of calculating the degrees of relationship between queries based on the degrees of association of terms. Therefore, Miller cannot show or suggest displaying terms associated with a certain term because Miller's apparatus does not have information regarding a degree of association of a relationship between the terms, and does not provide the calculation scheme.

Further, Applicants respectfully but strongly disagree with the Examiner's assertion that Miller teaches a table including terms from the queries, probable status, confidence factors, and etc., and the confidence factors are indicators of a degree of an association. Miller shows nothing about what are the confidence factors are. Miller does not show or suggest that the confidence factors indicate how strongly the terms are associated with each other, namely a degree of association of a relationship between terms.

Therefore, Miller does not show every element recited in claim 1. Accordingly, claim 1 is not anticipated by Miller.

Claim 16 has substantially the same features as those of claim 1. As such, the arguments set forth above are equally applicable here. Claim 1 being allowable, claim 16 must also be allowable.

As to dependent claims 2-15 and 17, the arguments set forth above with respect to independent claims 1 and 16 are equally applicable here. The corresponding base claim being allowable, claims 2-15 and 17 must also be allowable.

Claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over Miller in view of Murray et al. (U.S. Patent No. 6,876,930). Claims 6 and 12-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Miller in view of Chamberlin et al. (U.S. Patent No. 6,941,317). These rejections are respectfully traversed for the reasons set forth below.

As set forth above, Miller fails to teach all the elements recited in claim 1, from which claims 6, 10, and 12-15 depend. The secondary reference of Murray fails to provide any disclosure, teaching or suggestion that make up for the deficiencies in Miller. The secondary reference of Chamberlin also fails to provide any disclosure, teaching or suggestion that make up for the deficiencies in Miller.

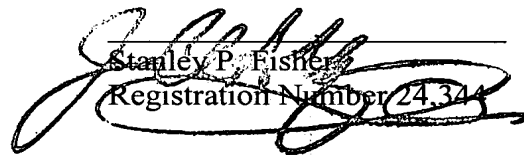
Therefore, at the time the invention was made, one of ordinary skill in the art would not and could not have looked to the prior art cited in order to achieve all the features of the present invention as recited in claim 1, from which claims 6, 10, and 12-15 depend. Accordingly, claims 6, 10, and 12-15 are not obvious in view of all the prior art cited.

#### Conclusion

In light of the Amendments and Remarks, Applicants respectfully request early and favorable action with regard to the present application, and a Notice of Allowance for all pending claims is earnestly solicited.

Favorable reconsideration of this application as amended is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicants' undersigned representative at the address and phone number indicated below.

Respectfully submitted,

  
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**October 1, 2007**  
SPF/JCM